

1 **BOIES SCHILLER FLEXNER LLP**
 2 David Boies (admitted pro hac vice)
 3 333 Main Street
 4 Armonk, NY 10504
 5 Tel.: (914) 749-8200
 6 dboies@bsfllp.com
 7 Mark C. Mao, CA Bar No. 236165
 8 Beko Reblitz-Richardson, CA Bar No. 238027
 9 44 Montgomery St., 41st Floor
 10 San Francisco, CA 94104
 11 Tel.: (415) 293-6800
 12 mmao@bsfllp.com
 13 brichardson@bsfllp.com
 14 James Lee (admitted pro hac vice)
 15 Rossana Baeza (admitted pro hac vice)
 16 100 SE 2nd St., 28th Floor
 17 Miami, FL 33131
 18 Tel.: (305) 539-8400
 19 jlee@bsfllp.com
 20 rbaeza@bsfllp.com
 21 Alison L. Anderson, CA Bar No. 275334
 22 M. Logan Wright, CA Bar No. 349004
 23 725 S. Figueroa St., 31st Floor
 24 Los Angeles, CA 90017
 25 Tel.: (213) 995-5720
 26 alanderson@bsfllp.com
 27 mwright@bsfllp.com

Attorneys for Plaintiffs**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

19 ANIBAL RODRIGUEZ, SAL
 20 CATALDO, JULIAN
 21 SANTIAGO, and SUSAN LYNN
 22 HARVEY, individually and on behalf of all
 23 others similarly situated,

24 Plaintiffs,

25 vs.

26 GOOGLE LLC,
 27 Defendant.

1 **SUSMAN GODFREY L.L.P.**
 2 Bill Carmody (admitted pro hac vice)
 3 Shawn J. Rabin (admitted pro hac vice)
 4 Steven M. Shepard (admitted pro hac vice)
 5 Alexander Frawley (admitted pro hac vice)
 6 Ryan Sila (admitted pro hac vice)
 7 One Manhattan West, 50th Floor
 8 New York, NY 10001
 9 Tel.: (212) 336-8330
 10 bcarmody@susmangodfrey.com
 11 srabin@susmangodfrey.com
 12 sshepard@susmangodfrey.com
 13 afrawley@susmangodfrey.com
 14 rsila@susmangodfrey.com

15 Amanda K. Bonn, CA Bar No. 270891
 16 1900 Avenue of the Stars, Suite 1400
 17 Los Angeles, CA 90067
 18 Tel.: (310) 789-3100
 19 abonn@susmangodfrey.com

MORGAN & MORGAN

20 John A. Yanchunis (admitted pro hac vice)
 21 Ryan J. McGee (admitted pro hac vice)
 22 Michael F. Ram, CA Bar No. 104805
 23 201 N. Franklin Street, 7th Floor
 24 Tampa, FL 33602
 25 Tel.: (813) 223-5505
 26 jyanchunis@forthepeople.com
 27 rmgeee@forthepeople.com
 28 mram@forthepeople.com

Case No.: 3:20-cv-04688-RS

**[PROPOSED] ORDER DENYING
GOOGLE'S MOTION FOR
CLARIFICATION OF CLASS
DEFINITION**

The Honorable Richard Seeborg
Courtroom 3 – 17th Floor

1 [PROPOSED] ORDER

2 Before the Court is Google LLC's Motion for Clarification of Class Definition, in which
3 Google requests an Order stating that the certified Classes do not include individuals who meet
4 the criteria of the Class definitions only by virtue of being supervised Google Accounts (which
5 Google calls "Unicorns") or enterprise Google Account (which Google calls "Dashers").

6 Having considered the parties' papers filed in support of and in opposition to Google's
7 Motion, and all other matters properly considered by this Court, the Court **DENIES** Google's
8 Motion. Supervised and enterprise accounts remain within the Class definitions.

9

10 **IT IS SO ORDERED.**

11 DATED: _____

12 Honorable Richard Seeborg
13 Chief United States District Judge

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28